

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UL LLC,

Plaintiff,

v.

JOSHUA CALLINGTON,

Defendant.

Case No. 1:24-cv-05631

The Honorable Andrea R. Wood

PLAINTIFF’S MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL

Plaintiff UL LLC (“UL”), by and through its attorneys, Littler Mendelson, P.C., respectfully moves this Court pursuant to Local Rule 26.2 for leave to file an exhibit under seal, which is cited in the Declaration of Michael Sperber in Support of Plaintiff’s Motion for A Limited Preliminary Injunction (“Sperber Declaration”). The Court may “enter an order directing that one or more documents be filed under seal” upon a showing of “good cause.” Local Rule 26.2(b). Specifically, the Court may enter an order “to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense, including ... requiring that a trade secret or other confidential research, development, or commercial information not be revealed or be revealed only in a specific way.” Fed.R.Civ.P. 26(c)(1)(G). As such, and in support of this Motion for Leave to File Exhibit Under Seal, UL states as follows:

1. The Sperber Declaration attaches an exhibit that UL asserts contains confidential business information. The exhibit is being filed to provide an example to the Court of the type of UL documents and/or information about which UL seeks protection through its motion for preliminary injunction. By this Motion, UL seeks to file this document under seal.

2. Specifically, UL respectfully asks this Court for leave to file the following Exhibit under seal:

a. Exhibit 1, Examples of Audit Report Documents, contain examples of misappropriated UL documents containing UL's and UL's customer's information that are the subject of UL's claims against Callington. The example is a compilation of UL's customer's information and UL's audit report process and procedure, and warrants a designation as confidential business information. If such information is not maintained as confidential (including under seal for purposes of this motion), and is instead publicly disclosed as Callington desires, there is a real and substantial risk of UL's and UL's customer's information being disclosed, causing harm to not only UL but to its customers. As such, Exhibit 1 should be filed under seal to preserve the secrecy and confidentiality of the customer information contained therein.

3. In accordance with Local Rule 26.2(c), and contemporaneously with the filing of this Motion, UL provisionally filed the Exhibit it seeks to file under seal.

4. Upon the foregoing, UL respectfully asks that the Court grant this Motion for Leave to File Under Seal and Order that the document now being provisionally filed under seal can be filed under seal.

Respectfully submitted,

UL LLC

By: /s/ James M. Witz

One of Plaintiff's Attorneys

James M. Witz

LITTLER MENDELSON, P.C.

321 North Clark Street, Suite 1100

Chicago, IL 60654

Telephone: 312.795.3246

Facsimile: 312.277.9416

E-mail: jwitz@littler.com

Kevin E. Griffith (*admitted pro hac vice*)

Emily E. Levy (*admitted pro hac vice*)

LITTLER MENDELSON, P.C.

41 South High Street, Suite 3250

Columbus, OH 43215

Telephone: 614.463.4210

Facsimile: 614.737.9135

E-mail: kgriffith@littler.com
elevy@littler.com

Dated: May 20, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have, this 20th day of May, 2025, filed a copy of the foregoing document, *Plaintiff's Motion for Leave to File Exhibit Under Seal*, electronically. Counsel of record for Defendant may access this filing through the Court's system.

/s/ James M. Witz

An Attorney for Plaintiff

4923-1188-1285.4 / 118575.1072